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**EXHIBIT A**

Produce witnesses pursuant to Rule 30(b)(6) who have knowledge of all aspects of Aventis's maintenance and retrieval of the following data for each drug manufactured by Aventis and identified in the AMCC, including the names of the databases in which such information is stored electronically:

- (a) All sales transaction data (as well as any discounts or any other price adjustments or offsets contained in the transaction data), including (i) price, (ii) number of units sold, (iii) transaction date, (iv) information sufficient to identify the type of transaction (*e.g.*, a sale, a return, etc.), (v) information sufficient to identify the product (*e.g.*, NDC, product description, form, strength, etc.), (vi) information sufficient to identify the customer, (vii) class of trade designations, and (viii) information sufficient to identify whether the units sold were intended for repackaging, along with the name of the repackager to which the units were sold.
- (b) All chargeback transactions, including (i) amount, (ii) date of credit, and (iii) information sufficient to identify the customer, class of trade designations (if any), and wholesaler to which the chargeback was paid, and (iv) the underlying contract price paid by the ultimate customer.
- (c) All rebate transactions, including (i) amount, (ii) date of rebate, (iii) information sufficient to identify the type of rebate, (iv) information sufficient to identify the customer, and (v) class of trade designations (if any).
- (d) All administrative fee transactions, including (i) amount, (ii) date of payment, (iii) information sufficient to identify the type of administrative fee (if applicable), (iv) information sufficient to identify the customer, and (v) class of trade designations (if any).
- (e) Any other discounts not reflected in the above (a through d), including but not limited to discounts achieved through bundling one product with another.



CERTIFICATE OF SERVICE

I hereby certify that I, Steve W. Berman, an attorney, caused a true and correct copy of the foregoing **NOTICE OF RULE 30(B)(6) DEPOSITION TO AVENTIS REGARDING SALES-RELATED FINANCIAL DATA** to be served on all counsel of record electronically on April 20, 2005, pursuant to Section D of Case Management Order No. 2.

By /s/ Steve W. Berman
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April 20, 2005

Via Facsimile

Michael L. Koon
SHOOK, HARDY & BACON, LLP
One Kansas City Place
1200 Main Street, 26th Floor
Kansas City, MO 64105

Re: In re Pharmaceutical Industry AWP Litigation

Dear Michael:

As you are aware, the Court has issued CMO No. 14, which sets forth various pre-trial deadlines for the Phase II defendants, including a discovery cut-off of December 3, 2005. Plaintiffs have served your client, Aventis, with multiple requests for production and interrogatories that seek, among other things, financial data relating to the sales of drugs that are the subject of the AMCC (the "Subject Drugs"). Indeed, Plaintiffs' requests that Aventis produce financial information date back to June 2003.¹

Based on experience gained by working with the Phase I defendants, Plaintiffs have refined their requests for sales-related data. For each of the Subject Drugs (by NDC), please provide the following information in ASCII text file or similar electronic format for the relevant time period:

- (a) All sales transaction data (as well as any discounts or any other price adjustments or offsets contained in the transaction data), including (i) price, (ii) number of units sold, (iii) transaction date, (iv) information sufficient to identify the type of transaction (e.g., a sale, a return, etc.), (v) information sufficient to identify the product (e.g., NDC, product description, form,

¹ Plaintiffs' prior requests for financial data can be found in discovery sets served on your client on June 17, 2003 (Request Nos. 27-28); June 19, 2003 (Request Nos. 19, 34 and 35); December 3, 2003 (Request Nos. 18, 33-34; Interog. No. 1); and March 31, 2004 (Request Nos. 25-28; Interog. No. 1).



April 20, 2005

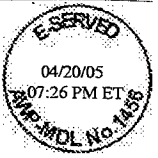
Page 2

strength, etc.), (vi) information sufficient to identify the customer, (vii) class of trade designations, and (viii) information sufficient to identify whether the units sold were intended for repackaging, along with the name of the repackager to which the units were sold.

- (b) All chargeback transactions, including (i) amount, (ii) date of credit, and (iii) information sufficient to identify the customer, class of trade designations (if any), and wholesaler to which the chargeback was paid, and (iv) the underlying contract price paid by the ultimate customer.
- (c) All rebate transactions, including (i) amount, (ii) date of rebate, (iii) information sufficient to identify the type of rebate, (iv) information sufficient to identify the customer, and (v) class of trade designations (if any).
- (d) All administrative fee transactions, including (i) amount, (ii) date of payment, (iii) information sufficient to identify the type of administrative fee (if applicable), (iv) information sufficient to identify the customer, and (v) class of trade designations (if any).
- (e) Any other discounts not reflected in the above (a through d), including but not limited to discounts achieved through bundling one product with another.
- (f) Include complete documentation for all items above (a through e) such as lists of fields, descriptions of information contained in those fields (e.g., field lengths, formats, etc.), and descriptions of any codes used in any fields (such as class of trade designations).

Exclude all sales to government entities (e.g., State Agencies, Veteran's Administration Facilities, Military, Federal Government Programs, Public Health Service, etc.). Sales to all other entities should be included, including sales to hospitals.

Plaintiffs request that Aventis produce this data in the above-requested format within 30 days. If you will be unable to provide this information within 30 days for all of the Subject Drugs, Plaintiffs ask that Aventis first produce the requested data for all physician-administered drugs within 30 days, followed by a supplemental production of data for the remaining drugs 30 days thereafter.



April 20, 2005

Page 3

We have also enclosed Rule 30(b)(6) deposition notices on this topic so that Plaintiffs can learn about the manner in which Aventis maintains sales data for its Subject Drugs.

Sincerely,

Steve W. Berman

Docket No. X07 CV-03-0083299-S (CLD)

STATE OF CONNECTICUT : SUPERIOR COURT
:
vs. : COMPLEX LITIGATION DOCKET
: AT TOLLAND
:
AVENTIS PHARMACEUTICALS, INC. : May 6, 2005


NOTICE OF DEPOSITION

TO: ALL COUNSEL ON ATTACHED SERVICE LIST:

Pursuant to Practice Book §13-26, et. seq., notice is hereby given that on June 10, 2005, at 9:30 A.M. at the offices of Shepherd, Finkelman, Miller, & Shah, LLC, 65 Main Street, Chester, Connecticut, 06412, before a Notary Public, Jeffrey Kodroff, Esquire and John Macoretta, Esquire, attorneys for the Plaintiff in the above-captioned action will take the deposition of defendant, Aventis Pharmaceuticals', Inc. §13-27(h) designee who is knowledgeable of the matters itemized in Exhibit "A."

The oral examination will continue from day to day until completed. You are invited to attend and examine the witness.

SPECTOR, ROSEMAN & KODROFF, P.C.

By 
Jeffrey Kodroff, Esquire
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Dated: May 6, 2005

EXHIBIT "A"

INSTRUCTIONS

All of the definitions from Plaintiffs' First Set of Requests For Production to Aventis are incorporated herein by reference.

"Spread" refers to the difference between AWP or any price upon which reimbursement for a drug is based, on the one hand, and the actual or net price paid for a drug on the other hand.

Unless otherwise specifically stated, each of these Areas of Inquiry encompasses the years 1993 through the present.

AREAS OF INQUIRY

1. The process by which You establish, state, change or are otherwise directly or indirectly involved in setting the AWP, List Price, WAC, Average Wholesale Price, actual sales price, contract price or any other price for each of Your Listed Pharmaceuticals, including the names or job titles of all personnel involved in said processes and all documents created in connection with said processes.
2. Your policies or practices concerning the calculation, determination, dissemination, communication or publication of the AWP, List Price, WAC, or any other price for all of Your Listed Pharmaceuticals.
3. The process by which You decide to offer any type of discount, rebate, incentive or penalty in connection with the purchase of any Listed Pharmaceuticals, and the names or job titles of all personnel involved in said process.

4. The identity and nature of any regularly created documents which report, review, comment upon or analyze any price stated or charged for any of Your Listed Pharmaceuticals.
5. The method by which You calculate or determine the average sales price for Your Listed Pharmaceuticals, including any determination or rendering of actual transaction costs and/or revenues at any level of the distribution or processing chains.
6. The method by which You calculate or determine the net profit for each of Your Listed Pharmaceuticals.
7. The nature of Your efforts to market, promote or tout the Spread on any of Your drugs, and the names or job titles of all personnel involved in said efforts.
8. The nature of Your efforts to market, promote or sell any of Your Listed Pharmaceuticals including, but not limited to, Your marketing, promotion or sales efforts directed towards the State of Connecticut, including all of its agencies, divisions, departments and employees.
9. The identity and nature of Your communications with the State of Connecticut, including all of its agencies, divisions, departments and employees.

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MDL No. 1456
LITIGATION)	
_____)	CIVIL ACTION: 01-CV-12257-PBS
)	
THIS DOCUMENT RELATES TO)	Judge Patti B. Saris
ALL ACTIONS)	
_____)	

NOTICE OF DEPOSITION

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs, by their attorneys, will take the oral deposition, before a person contemplated by Fed.R.Civ.P. 28(a), of Defendant Aventis Pharmaceuticals', Inc. Fed.R.Civ.P. 30(b)(6) designee who is knowledgeable of the matters itemized in Exhibit "A."

The deposition will be recorded by stenograph and video. The deposition will take place on June 27, 2005, at 10:00 a.m., EDT, at the offices of Spector, Roseman & Kodroff, P.C., 1818 Market Street, Suite 2500, Philadelphia, Pennsylvania 19103.



You are invited to attend and examine the witness.

Respectfully submitted,

SPECTOR, ROSEMAN & KODROFF, P.C.

By /s/ John Macoretta
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John Macoretta, Esquire
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Dated: May 13, 2005



EXHIBIT "A"

INSTRUCTIONS

Plaintiffs incorporate by reference all of the Definitions from Plaintiffs' Omnibus Request for Production of Documents Related to All Defendants.

"Spread" refers to the difference between AWP or any price upon which reimbursement for a drug is based, on the one hand, and the actual or net price paid for a drug on the other.

Unless otherwise specifically stated, each of these Areas of Inquiry encompasses the years 1991 through the present.

AREAS OF INQUIRY

1. The process by which Aventis Pharmaceuticals, Inc. ("Aventis") establishes, states, changes or is otherwise directly or indirectly involved in setting the AWP, List Price, WAC, Average Wholesale Price, actual sales price, contract price or any other price for the following subject pharmaceuticals: Allegra, Allegra-D, Amaryl, Anzemet, Arava, Azmacort, Calcimar, Carafate, Cardizem, Gammar P.I.V., Intal, Nasacort, Taxotere, Trental. This area of inquiry includes identification of the names or job titles of all personnel involved in said processes and all documents created in connection with said processes.
2. Aventis' policies or practices concerning the calculation, determination, dissemination, communication or publication of the AWP, List Price, WAC, or any other price for the following subject pharmaceuticals: Allegra, Allegra-D, Amaryl, Anzemet, Arava, Azmacort, Calcimar, Carafate, Cardizem, Gammar P.I.V., Intal, Nasacort, Taxotere, Trental.



3. The process by which Aventis decides to offer any type of discount, rebate, incentive or penalty in connection with the purchase of the following subject pharmaceuticals: Allegra, Allegra-D, Amaryl, Anzemet, Arava, Azmacort, Calcimar, Carafate, Cardizem, Gammar P.I.V., Intal, Nasacort, Taxotere, Trental.

4. The identity and nature of any regularly created documents which report, review, comment upon or analyze any price stated or charged for the following subject pharmaceuticals: Allegra, Allegra-D, Amaryl, Anzemet, Arava, Azmacort, Calcimar, Carafate, Cardizem, Gammar P.I.V., Intal, Nasacort, Taxotere, Trental.

5. The method by which Aventis calculates or determines the average sales price for the following subject pharmaceuticals: Allegra, Allegra-D, Amaryl, Anzemet, Arava, Azmacort, Calcimar, Carafate, Cardizem, Gammar P.I.V., Intal, Nasacort, Taxotere, Trental. This area of inquiry includes any determination or rendering of actual transaction costs and/or revenues at any level of the distribution or processing chains.

6. The method by which Aventis calculates or determines the net profit for the following subject pharmaceuticals: Allegra, Allegra-D, Amaryl, Anzemet, Arava, Azmacort, Calcimar, Carafate, Cardizem, Gammar P.I.V., Intal, Nasacort, Taxotere, Trental.

7. The nature of Aventis' efforts to market, promote or tout the Spread on any of the following subject pharmaceuticals: Allegra, Allegra-D, Amaryl, Anzemet, Arava, Azmacort, Calcimar, Carafate, Cardizem, Gammar P.I.V., Intal, Nasacort, Taxotere, Trental. This inquiry includes the names or job titles of all personnel involved in said efforts.



8. The nature of Aventis' strategies, plans or efforts to market, promote or sell any of the following subject pharmaceuticals: Allegra, Allegra-D, Amaryl, Anzemet, Arava, Azmacort, Calcimar, Carafate, Cardizem, Gammar P.I.V., Intal, Nasacort, Taxotere, Trental.



CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2005, I served true and correct copies of the foregoing
Notice of Deposition via Verilaw on all counsel of record.

/s/ John Macoretta
Jeffery Kodroff, Esquire
John Macoretta, Esquire
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